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December 22, 2020

VIA ECF

Hon. John Michael Vazquez, U.S.D.C.
Frank R. Lautenberg U.S.P.O and Courthouse, Room 417
2 Federal Square
Newark, New Jersey 07102

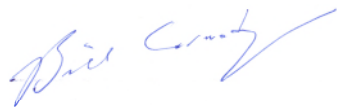
Re: *United States ex rel. Bahnsen, et al. v. Boston Scientific Neuromodulation Corp.*, Civil Action No. 2:11-cv-1210 (JMV/SCM)

Dear Judge Vazquez:

We represent the Relators in this False Claims Act case. On February 14, 2020, Judge Mannion issued a Report and Recommendation granting in part and denying in part Relators' motion for attorneys' fees and costs, recommending that the Court award Relators \$4,632,828.84 in attorneys' fees and \$908,583.33 in litigation costs, for a total award of \$5,541,412.17. Dkt. 487. On February 28, 2020, Defendant filed its objection to the Report and Recommendation, which remains pending before the Court. Dkt. 488. In light of Defendant's objection, Relators also filed a conditional objection. Dkt. 489. Neither party submitted a proposed order in connection with their objections.

To assist the Court in its resolution of this matter, and to make clear that Relators have no objection to the Report and Recommendation provided Defendant's objections are overruled, Relators have attached a proposed order adopting the Report and Recommendation in full. We appreciate the Court's continued attention to this matter.

Respectfully,



William Christopher Carmody

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